



Glenn Springs Holdings, Inc.

A Subsidiary of Occidental Petroleum Corporation

Rick Passmore
Sr. Director Operations
Direct Dial (713) 215-7622
Rick_Passmore@oxy.com

5 Greenway Plaza
Suite 110
Houston, Texas 77046

September 14, 2020

Via Electronic Mail

Ms. Renee Wawczak (Wawczak.Renee@epa.gov) – Project Manager
Mr. Todd Gmitro (Gmitro.Todd@epa.gov) – Project Manager
Mr. Justin Abrams (Abrams.Justin@epa.gov) – Financial Assurance Coordinator
United States Environmental Protection Agency
Region 5 [Mail Code LU-16J]
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

RE: RCRA Facility Investigation – Initial Estimated Cost of the Work
EPA Docket No. RCRA-05-1010-0006
Former Cities Service Company Refinery Site, East Chicago, Indiana

Dear Ms. Wawczak, Mr. Gmitro and Mr. Abrams:

The enclosed RCRA Facility Investigation (RFI) Initial Estimated Cost of Work was prepared by OXY USA Inc. ("OXY") for your review and approval in accordance with the Financial Assurance requirements specified in Section XIII, Paragraph 41, of the Administrative Order on Consent RCRA-05-2020-0006 (AOC). This cost estimate is limited to the Work to be performed by OXY on the property referred to in the AOC as the Refinery Site.

With regard to demonstration of financial assurance to ensure funding of the costs identified on the enclosure, OXY had proposed a financial test mechanism to EPA that, based on further dialogue, will not be utilized. OXY will submit a draft agreement for a funded trust for EPA's review by September 19, 2020 that meets the terms and conditions of Section XIII, Paragraph 42, of the AOC.

CERTIFICATION

I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,

OXY USA Inc.

Rick Passmore

Project Manager

Enclosures

cc: Thomas Krueger, US EPA (Krueger.Thomas@epa.gov)
Scott Buckner, CITGO (SBuckner@citgo.com)

Mike Tomka, GHD (Michael.Tomka@ghd.com)
John-Eric Pardys, GHD (John-Eric.Pardys@ghd.com)
Frank Parigi, OXY (Frank_Parigi@oxy.com)
Laura Whiting, OXY (Laura_Whiting@oxy.com)
Caroline LeMire, Oxy (Caroline_LeMire@oxy.com)
Lloyd Landreth (llandreth@landrethlaw.com)